

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

TYLER A. LAMERS,

Defendant.

Case No. 24-CR-

**24-CR-036**

[18 U.S.C. §§ 922(a)(6) &  
924(a)(2)]

Green Bay Division

**INDICTMENT**

**COUNTS ONE THROUGH THREE**  
**(False statements to an FFL)**

**THE GRAND JURY CHARGES THAT:**

1. On or about the following dates, in the State and Eastern District of Wisconsin,

**TYLER A. LAMERS,**

in connection with acquiring firearms from Scheels Sports, a dealer licensed under Title 18, United States Code, Chapter 44, also known as a federal firearms licensee ("FFL"), knowingly made false statements with the intent to deceive the FFL about facts material to the lawfulness of the sale and disposition of such firearms.

2. Namely, in connection with the following firearm acquisitions, Lamers falsely declared on the Firearm Transaction Record ("ATF Form 4473") that (i) he was the actual buyer of the firearm when, in fact, he knew that he was buying the firearm for

someone else; and (ii) he was not an unlawful user of and addicted to any controlled substance, when, in fact, he was an unlawful user of and addicted to a controlled substance:

Count	Date	Make	Caliber	Serial #	Type
One	7/18/2023	Taurus	9-mm	AEB091363	Pistol
Two	7/29/2023	Taurus	9-mm	AEB122435	Pistol
Three	8/14/2023	Canik	9-mm	23CT31050	Pistol

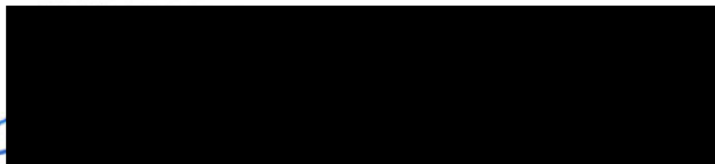
Each in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

### NOTICE OF FORFEITURE

Upon conviction of Count One, Two, or Three of this indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense, including, but not limited to, the following:

- a. a Taurus 9-mm pistol, serial number AEB091363,
- b. a Taurus 9-mm pistol, serial number AEB122435, and
- c. a Canik 9-mm pistol, serial number 23CT31050.

A TRUE BILL:



Dated: 2/21/2024

A handwritten signature in blue ink, appearing to read "Gregory J. Haanstad", written over a horizontal line.

GREGORY J. HAANSTAD  
United States Attorney